UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	**CASE NO. 25-cr-**
	:	
v.	:	**VIOLATION:**
	:	**18 U.S.C. § 1343 (Wire Fraud)**
JENNIFER MAY,	:	
	:	**FORFEITURE: 18 U.S.C. § 981(a)(1)(C),**
Defendant.	:	**28 U.S.C. § 2461(c), 21 U.S.C. § 853(p)**

INFORMATION

The United States Attorney charges:

COUNT ONE
(Wire Fraud)

1. Jennifer May resided in Washington, D.C.

2. May was the owner of Next Level Partners LLC, a consulting firm specializing in assisting campaigns with complying with campaign finance regulations and managing their accounts payable functions.

3. In response to the COVID-19 pandemic, the Small Business Administration offered certain entities, including small business owners, Economic Injury Disaster Loans ("EIDL"). These loans were provided directly from the SBA and were low-interest, fixed-rate, long-term loans. EIDL loan proceeds could be used for working capital to make regular payments for operating expenses, including payroll, rent/mortgage, utilities, and other ordinary business expenses, and to pay business debt.

The Scheme

4. From in or about October 2021 through in or about March 2022, May devised a scheme to defraud the United States government's Small Business Administration and to obtain

money and property by means of materially false and fraudulent pretenses, representations, and promises.

Manner and Means

5. May used the following manner and means in furtherance of the scheme:

a. On or about October 21, 2021, May applied for a second modification to an original EIDL application, requesting an additional $1,500,000 in EIDL funds for her business, Next Level Partners.

b. May falsely certified on loan applications that she would use all loan proceeds only for business-related purposes knowing and intending that she would misappropriate the loan proceeds and apply them toward cryptocurrency speculation as well unrelated business ventures and other personal expenditures

Execution of the Scheme

6. On or about October 21, 2021, May, for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce signals and sounds, when she applied for a second modification to her original EIDL application on behalf of NLP for an additional $1,500,000 and falsely certified that these loan proceeds would be used only for NLP-related purposes.

(Wire Fraud, in violation of Title 18, United States Code, Section 1343)

FORFEITURE ALLEGATION

1. Upon conviction of the offense alleged in Count One, the defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to this offense, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c). The United States will also seek a forfeiture money judgment against the defendant in the amount of $1,500,000.

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property that cannot be divided without difficulty;

the defendant shall forfeit to the United States any other property of the defendant, up to the value of the property described above, pursuant to 21 U.S.C. § 853(p).

(Criminal Forfeiture, pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853(p))

Respectfully submitted,

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By: ______________________________
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